IN THE UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

2

IN RE:

Roy Turner

: Chapter 13

Debtor

Case No. 22-11127

STIPULATION RE: MOTION FOR RELIEF FROM THE AUTOMATIC STAY

It is hereby STIPULATED and AGREED among the parties hereto, ROY TURNER by his attorney, BRAD J. SADEK, ESQUIRE and COBBLESTONES AT CHESTNUT HILL CONDOMINIUM ASSOCIATION by their attorney, GLENN M. ROSS, ESQUIRE, as follows:

- 1. The total post-petition debt is \$3,300.00.
- 2. The Debtor will pay \$1,100.00 by December 1, 2022, \$1,100.00 by January 1, 2023 and \$1,100.00 by February 1, 2023.
- 3. Beginning on December 1, 2027, and all future months thereafter, the Debtor will pay ongoing condominium fees of at least \$267.27 per month.
- 4. There will be a seven (7) day grace period for receipt of payments. After which, if payments are not received, a Notice of Default will be sent to the Debtor.
- 5. The Notice of Default will be accomplished by sending an e-mail to Brad Sadek, Esquire, attorney for the Debtor at brad@sadeklaw.com.

6. After the Notice of Default is forwarded, there will be ten (10) days for the Debtor to cure the default. After which, a Certificate of Default will be filed with the Court.

BRAD J. SADEK, ESQUIRE Counsel for Debtor

GHENN M. ROSS, ESQUIRE Counsel for Creditor